

# SEEGERWEISS LLP

August 1, 2018

**Via ECF**

Honorable Anita B. Brody  
United States District Judge  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

Re: *In re National Football League Players' Concussion Injury Litigation*,  
No. 12-md-2323-AB  
Cambridge Entities' Production in Response to Order, dated February 20, 2018, and  
Telephonic Conference of July 11, 2018

Dear Judge Brody:

Co-Lead Class Counsel respectfully submits this Status Report to provide the Court with an update on the issue of the Cambridge Entities' production of "accounting" documents for the Class Members' retirement monies, as directed by the Court's Order, dated February 20, 2018 [ECF No. 9750], and as discussed during the telephonic conference held on July 11, 2018 [ECF No. 10171]. Production was to be completed by July 31, 2018. The two documents attached hereto as Exhibit A ("Ex. A"), which are being submitted under seal in accordance with the February 20 Order, are what Cambridge produced this morning. Because Cambridge still has not produced the current account balances for each of the ten affected Class Members who invested their retirement funds, Cambridge has not complied with the Court's February 20 Order.

We advised Cambridge via email this morning that these two documents do not constitute compliance with the Court's Order. In response, Cambridge represented that further reports will be forthcoming from the auditor, but no date for same was provided. A copy of the email exchange is attached as Ex. B.

Additionally, I have become aware of other related litigation against attorney Phillip Timothy Howard and Cambridge. Attached hereto as Ex. C is the complaint filed in Florida state court by Class Member Corey Fuller, related to his retirement funds invested with Cambridge. Finally, I have become aware of a complaint filed with the Florida Bar by former Howard & Associates' attorney, J.B. Harris, which references this litigation and an open Securities and Exchange Commission investigation. That complaint is attached hereto as Ex. D, and it is also publicly available at <https://images.law.com/contrib/content/uploads/documents/392/23500/HARRIS-BAR-COMPLAINT-v.-HOWARD.pdf>. See Ex. D, at 6.

Honorable Anita B. Brody

August 1, 2018

Page 2

I thank the Court for its consideration of this submission.

Respectfully,

/s/ Christopher A. Seeger

Christopher A. Seeger

*Co-Lead Class Counsel*

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing Status Report, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: August 1, 2018

*/s/ Christopher A. Seeger*  
Christopher A. Seeger